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Arizona Department of Child Safety ("DCS"),
Madison Bell, and Mecca Temple*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Jessica Kahraman, an individual; D.K., a
minor, through his parent and guardian
Jessica Kahraman; and K.K., a minor,
through his parent and guardian Jessica
Kahraman,

Plaintiffs,

v.

The State of Arizona, a governmental entity,
et al.,

Defendants.

Case No. 2:22-cv-00375-SRB

**DEFENDANTS' RESPONSE TO
PLAINTIFFS' MOTION FOR
EXTENSION OF TIME FOR
PLAINTIFFS TO RESPOND TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT, AND
DEFENDANTS' MOTION TO
EXTEND REPLY BRIEF DEADLINE**

Defendants State of Arizona, Arizona Department of Child Safety ("DCS"), Madison Bell and Mecca Temple (collectively, "State Defendants") hereby respond to Plaintiffs' Motion for an Extension of Time (Doc. 218) as follows:

In its Second Amended Case Management Order, of July 10, 2024 (Doc. 209), this Court ordered the deadline to file dispositive motions filed by December 16, 2024. The Court vacated the pretrial deadlines, Pretrial Conference, and Trial date to be reset after dispositive motions are ruled on. The Court ordered that no further extensions will be granted.

On December 16, 2024, the State Defendants filed their Motion for Summary Judgment and Statement of Facts (Doc. 216 and 217). Pursuant to Local Rule 56.1, the

1 deadline for Plaintiffs to respond is January 15, 2025, and the Reply Brief deadline is
2 January 31, 2025.

3 The State Defendants do not oppose Plaintiffs' request to extend their Response
4 deadline to Defendants' Motion for Summary Judgment to February 18, 2025, if this is
5 agreeable with the Court, and if the State Defendants will not be prejudiced by such
6 extension.

7 In that regard, undersigned counsel advised Plaintiffs' counsel that he has a jury trial
8 commencing February 18, 2025, and then will be out of the State from February 27, 2025
9 through March 3, 2025. The first opportunity for undersigned counsel to read Plaintiffs'
10 Response would not be until March 4, 2025. If the Court grants Plaintiffs' counsel's request
11 for an extension to file their Response on February 18, 2025, the State Defendants' Reply
12 deadline would be March 5, 2025. A March 5, 2025 Reply deadline would prejudice the
13 State Defendants.

14 Thus, if this Court grants Plaintiffs' request for an extension to file its Response on
15 February 18, 2025, the State Defendants move for good cause that its Reply deadline be
16 extended to March 17, 2025. The State Defendants have submitted a revised proposed Order
17 from the one submitted by Plaintiffs addressing a reciprocal extension of the Reply Brief
18 deadline in the event this Court grants Plaintiffs' Motion for Extension of the Response
19 deadline.

20 RESPECTFULLY SUBMITTED this 20th day of December, 2024.

21 **BRUECKNER SPITLER SHELTS PLC**

22 By: /s/ Larry J. Crown

23 Larry J. Crown

24 Elan S. Mizrahi

25 *Attorneys for Defendants The State of*
26 *Arizona, Arizona Department of Child*
27 *Safety ("DCS"), Madison Bell, and Mecca*
28 *Temple*

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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of December, 2024, I electronically transmitted the foregoing document to be filed electronically with the Clerk's Office through the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to be served on all counsel of record via the Court's CM/ECF system.

/s/ *Karin A. Meister*

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